

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff,

v.

THOMAS FARMER,
Defendant.

Criminal Case No. 3:13-cr-00162-DRD

DEFENDANT'S NOTICE OF EARLIEST AVAILABILITY

Comes now the Defendant Thomas Farmer and hereby gives notice that, after the time periods for resolution of the pending defense motions have expired, the earliest date the defendant is available for trial is April 13, 2015. In addition, Defendant gives notice that he will be filing additional motions prior to April 13, 2015 for relief from the Court.

Respectfully submitted,

Dated: February 26, 2015

By: /s/ Terrance G. Reed
Terrance G. Reed (Pro Hac Vice)
V. Thomas Lankford (Pro Hac Vice)
Lankford & Reed, PLLC
120 N. St. Asaph Street
Alexandria, VA 22314
(Phone) 703-299-5000
(Facsimile) 703-299-8876
tgreed@lrfirm.net
vtlankford@lrfirm.net

By: /s/ Joseph C. Laws

Joseph C. Laws
(USDC-PR Bar No. 120306)
239 Arterial Hostos Avenue, Suite 402
San Juan, PR 00918
(Phone) 787-754-7777
(Facsimile) 787-763-5223
lawofficesofjosephlaws@gmail.com
Counsel for Defendant Thomas Farmer

CERTIFICATE OF SERVICE

I hereby certify on the 26th day of February, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Craig Y. Lee, PR Attorney #G01208
Jon B. Jacobs, PR Attorney #G01508
Trial Attorneys
U.S. Department of Justice
Antitrust Division
National Criminal Enforcement Section
450 5th St., NW Suite 11300
Washington, DC 20530
Tel: (202) 307-6694
Fax: (202) 514-6525
Email: jon.jacobs@usdoj.gov

By: /s/ Terrance G. Reed (Pro Hac Vice)
LANKFORD & REED, PLLC
120 N. St. Asaph Street
Alexandria, VA 22314
(Phone) 703-299-5000
(Facsimile) 703-299-8876
tgreed@lrfirm.net